

March 28, 2018

Marlene H. Dortch  
Secretary, Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation in GN Docket No. 17-258**

Dear Ms. Dortch:

On March 26, 2018, representatives from Motorola Solutions, Inc. met with Erin McGrath, Wireless Advisor to Commissioner O’Rielly, and Travis Litman, Chief of Staff to Commissioner Rosenworcel, in separate meetings to discuss the rules and proposals under consideration for the 3550-3700 MHz Citizens Broadband Radio Service (CBRS) in the above-referenced proceeding.

Attending these meetings on behalf of Motorola Solutions were myself, Jerry Gard, Director of Engineering, and David Gurney, Distinguished Member of the Technical Staff. During the two meetings, Motorola Solutions discussed its plans for manufacturing and marketing CBRS equipment and services for critical infrastructure industries, manufacturing, enterprises, schools and higher education, and other private business broadband applications delivered over campus settings. We stated that the CBRS market for these types of entities depends greatly on the availability of priority access licenses (PALs) covering smaller-sized service areas to maximize deployment opportunities for users of smaller, high quality of service (“QoS”) private networks in interference protected spectrum. These private networks will be a catalyst to drive a new ecosystem of innovative applications and use cases in these industries and enterprises. Therefore, Motorola Solutions urged the Commission to ensure that any newly adopted CBRS rules or provisions continue to provide opportunities for parties to bid on PALs covering service areas that are much smaller than Partial Economic Areas. Finally, we reiterated our concern that without substantive changes, secondary markets for PAL sub-licensing are not a viable option for providing access for private CBRS networks.

The expressed positions are fully consistent with our previously filed comments.<sup>1</sup> If there are any questions with this submission, please contact the undersigned.

Respectfully Submitted,

/s/ Genaro Fullano

Genaro Fullano  
Senior Director Government Affairs  
Motorola Solutions Inc.  
1455 Pennsylvania Avenue  
Washington, D.C. 20004

CC: Erin McGRath  
Travis Litman

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<sup>1</sup> See Comments of Motorola Solutions, Inc., GN Docket No. 17-258, submitted December 28, 2017. See also, Comments of Motorola Solutions, Inc. in Response to Petitions for Rulemaking, GN Docket No. 12-354, submitted July 24, 2017.